

## **Food Packaging made from Recycled Paper and Board**

Monitoring in Europe of packaging and foods has identified mineral oil contamination in a range of packaged foods. Mineral oils are widely used, and end up in foodstuffs by various routes which are being explored.

Food packaging has been identified as one source of the contamination in the foodstuffs. For instance, mineral oil can migrate from recycled paper and board, and from mineral oil-based print on the non-food contact side of packaging.

Several bodies, including the German Federal Ministry of Food and Agriculture (BMEL) have insisted that the food packaging chain takes measures such that levels of mineral oil in foodstuffs are reduced. Additionally, the BMEL is preparing legislation aimed at restricting mineral oil in food contact materials made from recycled paper and board.

In this respect, the European trade associations representing the paper industry (CEPI) and the paper converting industries (CITPA) have recommended to their members to only use mineral oil-free printing inks on paper and board packaging. Additionally, the German Federation for Food Law and Food Science (BLL) has recommended to the food industry - besides other measures - the use of specific printing inks:

- **for food packaging:** printing ink systems, which have been optimized for low migration
- **for all other packaging:** mineral oil free printing inks

To enable printers and convertors to meet their respective industry association's commitment, EuPIA identified appropriate packaging ink options in the information note "Printing ink industry contribution to the paper, paper converting and food industry initiatives to reduce mineral oil in paper and board packaging" ([www.eupia.org](http://www.eupia.org)).

The recycled paper or board itself must be considered as a main source of mineral oil: the waste paper from which it is made currently contains a significant proportion of used newspapers. Inks for printing newspaper (news inks) contain mineral oils as an important part of the formulation, which upon printing are absorbed by the paper (this is how printed news inks dry). Thus mineral oils may come into direct contact with foodstuffs as substances contained within the recycled paper and board, unless the packaging is designed such that transfer of the mineral oil is avoided.

This observation is not new, and therefore the ink industry has long advised caution when using recycled paper and board as food packaging (see EuPIA information note: "Recyclability of printed paper and board articles for use in food packaging").

In this context, the European Food Safety Agency EFSA has stated in its Scientific Opinion on Mineral Oil Hydrocarbons in Food<sup>1</sup>:

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<sup>1</sup> EFSA Panel on Contaminants in the Food Chain (CONTAM); Scientific Opinion on Mineral Oil

*“MOH [Mineral Oil Hydrocarbons] contamination of food by the use of recycled paperboard as packaging material may be a significant source of dietary exposure. It can be effectively prevented by the inclusion of functional barriers into the packaging assembly. Other measures may include segregation of recovery fibre sources intended for recycling and the increasing of the recyclability of food packages by avoiding the use of materials and substances with MOH in the production of food packages.”*

A cross industry platform has been established (called “MOCRINIS”) to bring together representatives from several industry sectors to address all aspects that have arisen following the publication of results demonstrating the presence of saturated and aromatic hydrocarbons in some food. The topics of measurement and characterization, exposure to and toxicity of hydrocarbons were discussed in a workshop in September 2013, the proceedings of which were published as Report No. 2/14 on the CONCAWE website ([www.concawe.eu](http://www.concawe.eu)).

News inks, as any other publication inks, are safe for their intended purpose. However, they are not designed to come into contact with food, whether direct or indirect. Therefore appropriate measures must be taken by the paper recycling industry and the packaging industry that avoid the transfer of mineral oils or other components of the packaging into food beyond acceptable limits.

Nonetheless, some expert audiences and media demand that the mineral oils contained in news inks should be substituted by vegetable oils or vegetable oil esters.

Mineral oil free news inks are feasible in principle, but not currently available due to lack of market demand. Historically, some alternatives based on vegetable oils were placed on the market, but they were deemed to be economically unsatisfactory and were not fully qualified technically. Before such replacements become viable, a number of print characteristics will have to be optimised during ink development and press trials.

However, such potential investments which would in any case involve higher costs are only justified when reliable regulatory conditions are set by the legislators. These conditions relate to accepted limit values for the migration of substances from paper and board packaging into food, and must be determined not only for mineral oils but for any other migratable substances which have not been evaluated according to food safety standards, but which are likely to be present in recycled paper and board.

EuPIA, 2011-03-03  
1<sup>st</sup> amendment 2012-10-16  
2<sup>nd</sup> amendment 2015-03-11  
3<sup>rd</sup> amendment 2015-12-01